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Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Lifeline Compliance Filings, WC Docket No. 14-171
2017 FCC Form 555 for **BellSouth Telecommunications, LLC** (Study Area Codes: 215191, 225192, 235193, 245194, 255181, 265182, 275183, 285184, 295185); **Southwestern Bell Telephone Company** (Study Area Codes: 405211, 415214, 425213, 435215); **Nevada Bell Telephone Company** (Study Area Code 555173); **Illinois Bell Telephone Company** (Study Area Code 345070); **Indiana Bell Telephone Company, Incorporated** (Study Area Code 325080); **Michigan Bell Telephone Company** (Study Area Code 315090); **The Ohio Bell Telephone Company** (Study Area Code 305150); and **Wisconsin Bell, Inc.** (Study Area Code 335220)

Dear Ms. Dortch:

Attached please find AT&T's 2017 FCC Form 555 on behalf of the above referenced affiliated eligible telecommunications carriers ("ETCs").¹

The 2017 FCC Form 555 requires ETCs to report the number of subscribers claimed on its February 2016 FCC Form 497, among other data elements. In accordance with ¶ 17(a) of the Consent Decree in DA 15-485, in preparing the February 2016 Forms 497, AT&T performed its monthly statistically significant sample of the eligibility records for new Lifeline subscribers. In reviewing that sample, AT&T confirmed whether it had a complete, current, and accurate eligibility certification for each subscriber. AT&T also compared the sample to the NLAD database to confirm eligibility. In accordance with the Consent Decree, AT&T reduced the number of retail subscribers for whom it sought Lifeline reimbursement on its February 2016 FCC Forms 497 by applying the upper limit of the February 2016 weighted average error rates to the total number of retail subscribers. For this reason, the sum of the numbers reported in Block F and Block K of the AT&T affiliated ETCs FCC Form 555 do not equal the numbers reported in Block E².

¹ BellSouth Telecommunications, LLC does business in nine states under a different name as follows: AT&T Alabama (SAC 255181), AT&T Florida (SAC 215191), AT&T Georgia (SAC 225192), AT&T Kentucky (SAC 265182), AT&T Louisiana (SAC 275183), AT&T Mississippi (SAC 285184), AT&T North Carolina (SAC 235193), AT&T South Carolina (SAC 245194), and AT&T Tennessee (SAC 295185). Southwestern Bell Telephone Company does business in each of the four states under a different name as follows: AT&T Arkansas (SAC 405211), AT&T Kansas (SAC 415214), AT&T Missouri (SAC 425213) and AT&T Oklahoma (SAC 435215). The remaining affiliated ETCs do business in each state using the following names: AT&T Nevada (SAC 555173), AT&T Illinois (SAC 345070), AT&T Indiana (SAC 325080), AT&T Michigan (SAC 315090), AT&T Ohio (SAC 305150) and AT&T Wisconsin (SAC 335220).

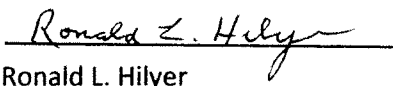
² In addition to the adjustment described pursuant to the Consent Decree, AT&T notes that the Nevada administrator conducted its annual recertification for the first time in 2016, and provided the numbers



AT&T is providing this information by cover letter rather than on the affiliated ETCs FCC Forms 555 based on advice from USAC in 2014 that modifications on FCC or OMB approved forms without written approval from the Commission are not accepted. Both USAC and Commission staff had no objection to AT&T providing this information in a cover letter.

Please do not hesitate to contact me if you have any questions about the information provided in this cover letter or if you desire any further information.

Very truly yours,


Ronald L. Hilyer
Controller

Attachments

reported in Blocks D, K and L. AT&T is working with the Nevada administrator to reconcile the subscriber data the administrator provided in connection with these numbers.